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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

13 In re:
14 **PG&E CORPORATION,**
15 **PACIFIC GAS AND ELECTRIC COMPANY,**
16 **Debtors.**

16 ☐ Affects PG&E Corporation
17 ☐ Affects Pacific Gas and Electric Company
18 ☒ Affects both Debtors

18 ** All papers shall be filed in the Lead Case,*
19 *No. 19-30088 (DM).*
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Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**FIRE VICTIM TRUSTEE'S
STATEMENT OF NON-
OPPOSITION TO
CONSOLIDATED MOTIONS TO
DEEM LATE-FILED CLAIMS
TIMELY FOR THE PURPOSE
OF CLAIM ADMINISTRATION
BY THE FIRE VICTIM TRUST**

[Relates to Docket Number 12915]

1 Cathy Yanni, in her capacity as the Trustee (the “**Trustee**”) of the Fire Victim Trust (the
2 “**Trust**”), by and through her undersigned counsel and as directed by the *Order Consolidating*
3 *Motions to File Late Claims* entered August 24, 2022 [Docket No. 12875] (the “**Consolidation**
4 **Order**”) and the *Order re Supplemental Exhibit to Order Consolidating Motions to File Late*
5 *Claims* entered September 1, 2022 [Docket No. 12923] (the “**Supplemental Consolidation**
6 **Order**”), respectfully states as follows:

7 1. The Trust has been monitoring all motions filed with this Court that seek to have
8 late-filed proofs of claim deemed “timely” for the purpose of having such claims administered by
9 the Trust.¹

10 2. In keeping with current Trust policy, the Trustee does not oppose the *Consolidated*
11 *Motion to Allow/Deem Timely Late Filing of Claimants, and Memorandum of Points and*
12 *Authorities and Declaration of Robert Bone in Support Thereof* [Docket No. 12915] (the “**Late**
13 **Claim Motion**”) with respect to the claimants listed on Exhibit A hereto. Given the number of late
14 claim motions filed in recent months² and the amount of time that has passed since the December
15 31, 2019 bar date for Fire Victim Claims and the February 26, 2021 deadline to submit claims
16 questionnaires to the Trust, the Trustee will be discontinuing the current non-opposition policy with
17 respect to late claim motions filed after September 30, 2022.

18 3. The proofs of claim listed on Exhibit A and any claims asserted in connection with
19 such proofs of claim are subject to the requirements of the CRP and are not allowed or approved by
20 the filing of this statement. Nothing herein shall be construed to be a waiver by the Trust of any
21 right to object to the proofs of claim listed on Exhibit A or any claims asserted in connection with
22 such proofs of claim on any grounds other than the untimely filing thereof.

24 ¹ The Fire Victim Trust Claims Resolution Procedures (“**CRP**”) mandate that claimants must have
25 timely filed a proof of claim to be eligible to receive compensation from the Trust. See CRP §I.

26 ² Of the 394 late claim motions filed since the December 31, 2019 extended bar date, 216 have been
27 filed in the last six months and 161 were filed in August alone. To put these numbers in perspective, in
28 2020, which included the months immediately after the Extended Bar Date and the effective date of the
Trust (both events that could be expected to prompt the filing of late claim motions), the total number of late
claim motions filed alleging Fire Victim Claims was 55. In 2021, the total number was only 22.

1 DATED: September 14, 2022

BROWN RUDNICK LLP

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By: /s/ Eric R. Goodman
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Attorneys for Fire Victim Trustee

EXHIBIT A
LIST OF CLAIMANTS

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DATE POC FILED	POC NO.	CLAIMANT(S)
8-24-2022	108824	Anthony Agocs and Elizabeth Agocs
8-23-2022	108815	James Allen and Mary Ann Allen
8-24-2022	108827	David Ashworth and Ardith Ashworth
8-25-2022	108833	Edward Biglin and Mary Rychly
8-24-2022	108821	Judith Browning and David Browning
8-24-2022	108826	Michael Canar and Linda Canar
8-23-2022	108818	Jon Diederich and Susan Paterson
8-24-2022	108825	Suzan Fleissner
8-24-2022	108823	Kurt Hawkyard, Richard James Hawkyard, Beverly Hawkyard, Richard William Hawkyard, and Dakota Kenoyer-Hawkyard
8-23-2022	108817	Gail Henry
8-20-2022	108788	Elisabeth LaPointe
8-24-2022	108829	Mark R. Mandoli and Christine L. Mandoli
8-24-2022	108831	Jeremia Mills, Sheila Wolski, Daniel Mills, and Michael Mills
8-25-2022	108832	Louise Munoz-Flores and Robert Harold Flores
8-23-2022	108819	Charles C. Oncea, III, and Susan Oncea
8-20-2022	108787	Alisha Panoski, Jaxson Gilardo, Noah Gilardo, and Marc Anderson
8-23-2022	108810	Mel Luis Panoski and Mason Panoski [Surname misspelled as <i>Panoske</i> on POC]
8-23-2022	108820	Edna Mae Pelton and Robert L. Pelton
6-22-2022	108546	Gregory Peters
8-24-2022	108830	Kevin Ryan, Martha Ryan, Megan Ryan and Charles Ryan
8-19-2022	108781	Tomi Speed and Robert Speed
8-24-2022	108828	Sandy Throne
8-21-2022	108791	Elliot Wolf and Joyce Wolf
8-26-2022	108834	Gail Holmes
8-26-2022	108835	Victor Zayas and Julie Zayas
8-26-2022	108836	Mary Lavin and Mark Lavin
8-26-2022	108837	Lilian Alred
8-26-2022	108838	Janet Perrone, Gregory Perrone and Jeffrey Perrone
8-26-2022	108839	Muriel Caddell
8-26-2022	108841	Mackenzie Crownover, Chris Crownover, Ethan Crownover, and Gavin Crownover
8-26-2022	108842	Darrin Rash and Dawn K. Rash
8-26-2022	108843	Matthew Hernandez, Jill Linton-Hernandez, Nicholas Hernandez, and Claire Hernandez
8-27-2022	108844	Gail Passalacqua
8-27-2022	108845	Victor Gonzalez and Andrea Gonzalez
8-26-2022	108847	Ellen Turner and Alan Turner
6-29-2022	108615	Courtney Meyer, Sonoma Bates and Levi Bates

DATE POC FILED	POC NO.	CLAIMANT(S)
8-28-2022	108848	Rosa M. Gutierrez, Carlos E. Gutierrez, Sofia N. Gutierrez, Esmeralda M. Gutierrez and Selena V. Gutierrez
8-28-2022	108849	Corinne Quintana, Ryan Quintana, Gavin Quintana, and Laurel Quintana
8-28-2022	108850	Kevin Wolski, Leslie Wolski, Jake Wolski, Marcus Wolski, and Maggie Wolski
8-28-2022	108851	Cindy Malone and Tyler Malone
8-28-2022	108853	Mike Hartnett
8-28-2022	108854	Dorothy Pritchett
8-28-2022	108855	Elizabeth Frazelle and Gary Kettlewell
8-28-2022	108840	Daniel Sullivan, Julie Sullivan, and Claire Sullivan
8-28-2022	108856	Nancy Graalman
8-28-2022	108857	Jocelyn Farrell
8-29-2022	108859	Thomas Lamb Henry and Margaret Dee Henry
8-30-2022	108868	Mason Levinson
8-30-2022	108863	William Dean Vlahandreas and Lauren Frances Vlahandreas
8-30-2022	108867	Richard McChinak and Stephanie McChinak
8-30-2022	108869	Anne Elizabeth Henry and Mariana Napoles
8-30-2022	108865	Hossain Ali Beejan Roohian, Jade Elyse Roohian, Cyrus Sinclair Roohian, and Enzo Marcel Roohian
8-30-2022	108864	Douglas Alan Munro
8-31-2022	108873	Ron Guest and Linda Garaicotchea
8-31-2022	108874	Dan Buscovich and Donna Buscovich
8-31-2022	108875	Dan Miller and Brian Roth
8-31-2022	108887	Naydra Kauwe
8-31-2022	108878	Sandra Shulkin
8-29-2022	108858	Scott Faber
8-2022-2022	108805	Susan M. Sandholm and Melvin A. Sandholm
8-31-2022	108882	Paula Elizabeth Trejo Maldonado and Antonio Ochoa Trejo
8-31-2022	108883	Nick Valencia
8-31-2022	108881	Cynthia Doell and Danny Ruckman
8-31-2022	108880	Cynthia M. Kramer and Norman T. Kramer
8-31-2022	108890	Deborah Harlan